

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RONALD A. CUP, on behalf of himself and
all other persons similarly situated; and
UNITED STEEL, PAPER AND FORESTRY,
RUBBER, MANUFACTURING, ENERGY,
ALLIED INDUSTRIAL, AND SERVICE
WORKERS INTERNATIONAL UNION,
AFL-CIO,

Plaintiffs,

v.

AMPCO-PITTSBURGH CORPORATION,
AKERS NATIONAL ROLL COMPANY,
and AKERS NATIONAL ROLL COMPANY
HEALTH & WELFARE BENEFITS PLAN,

Defendants.

Civ. A. No. 2:17-cv-00189-AJS

Judge Arthur J. Schwab

Class Action

Demand for Jury Trial

**PLAINTIFFS' MOTION FOR (1) CLASS CERTIFICATION,
(2) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT
AGREEMENT, (3) APPROVAL OF CLASS NOTICE, AND
(4) ORDER SETTING DATE FOR FINAL FAIRNESS HEARING**

Plaintiffs Ronald A. Cup ("Named Plaintiff") and the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO/CLC have entered into a proposed settlement with Defendants Ampco-Pittsburgh Corporation, Akers National Roll Company, and the Akers National Roll Company Health & Welfare Benefits Plan. The parties have entered into a Settlement Agreement, which is attached as Exhibit A, and also have agreed on a proposed Class Notice, attached as Exhibit B.

Plaintiffs now move for: (1) class certification of the Settlement Class (as defined in the Settlement Agreement) for settlement purposes only; (2) preliminary approval of the Settlement Agreement; (3) approval of the proposed Class Notice; and (4) entry of an order setting a date for

a hearing on the fairness of the Settlement Agreement pursuant to Fed. R. Civ. P. 23(e)(2), along with other pertinent dates. Plaintiffs submit the accompanying Memorandum, Settlement Agreement, Class Notice and other materials in support of this motion, as well as a proposed order. Defendants do not oppose this motion.

Dated: March 27, 2019

Respectfully submitted,

s/ Pamina Ewing

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